

EXHIBIT D

TIMOTHY ELDER (CA BAR NO. 277152)
KRISTOPHER A. NELSON (CA BAR NO. 342552)
TRE LEGAL PRACTICE
1155 Market Street, Tenth Floor
San Francisco, CA 94103
Telephone: (415) 873-9199
Facsimile: (415) 952-9898
Email: telder@trelegal.com, knelson@trelegal.com

S. Tomiyo Stoner (CA Bar No. 289246)
Undaunted Law Firm, P.C.
1500 Dragon St. Suite 160
Dallas, Texas 75039
Telephone: (214) 415-7340
E-mail: tstoner@undauntedlaw.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

LISAMARIA MARTINEZ,

Plaintiff,

v.

**COUNTY OF ALAMEDA, MELISSA
WILK**, in her individual capacity, **EVA HE**,
in her individual capacity, **MARIA LAURA
BRIONES**, in her individual capacity,

Defendants.

Case No. 3:20-cv-06570-TSH

**PLAINTIFF'S SECOND
SUPPLEMENTAL DISCLOSURES
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 26**

While Plaintiff has not completed her investigation or analysis of the facts relating to this case and has not completed preparation for trial, she nevertheless hereby supplements her disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure, without prejudice to her right to produce evidence of any subsequently discovered facts or interpretations of facts, or to otherwise further supplement or amend disclosures. The supplemental information contained herein is true and correct to the best knowledge of Plaintiff at this time, but is subject to correction or further supplementation with any subsequently discovered errors or omissions. By

1 supplementing her disclosures, Plaintiff is neither waiving any objections to, nor conceding the
2 admissibility of the information disclosed.

3 **A. Individuals**

4 Subject to the above reservations, Plaintiff makes the following supplemental disclosures to
5 her initial disclosures under Federal Rule of Civil Procedure 26(a)(1)(A)(i) of individuals now
6 known to Plaintiff who are likely to have discoverable information that Plaintiff may use to
7 support her claims:

- 8 1. Serena Olsen has knowledge of Plaintiff's return trip to the CRO in May 2019, the
9 transportation costs of that return trip, the emotional distress experienced by Plaintiff,
10 and the general nature of Plaintiff's injuries. Her phone number is (510) 320-1299, and
11 her address is 14012 Reed Avenue, San Leandro, California, 94578.
- 12 2. Emily Grimm has knowledge of Plaintiff's emotional distress after suffering
13 discrimination by Defendants on March 29, 2019. Her phone number is (707) 704-
14 0416, and her address is 34862 Lilac Street, Union City, California, 94587.
- 15 3. Marco Salsiccia is a blind individual with knowledge of the experience of using a
16 County scribe to complete and file a paper FBNS form between 12/8/2022 and
17 12/22/2022 in the Oakland Clerk Recorder's Office. His address is 10405 Foothill
18 Blvd., Oakland, CA 94605. He may be contacted through counsel for Plaintiff.
- 19 4. Lucia Greco is a blind individual with knowledge of the experience of using a County
20 scribe to complete and file a paper FBNS form between 12/8/2022 and 12/22/2022 at
21 the Oakland Clerk Recorder's Office. Her address is 819 Peralta Ave., Berkeley, CA
22 94707. She may be contacted through counsel for Plaintiff.
- 23 5. Samantha Shipman may have knowledge of the process of completing an FBNS form
24 at the CRO as a blind person using the computer with the JAWS screen reader that
25 was disclosed in June 2023. Her address is 15101 Wiley Street, San Leandro, CA
26 94579. She may be contacted through counsel for Plaintiff.
- 27 6. Joseph A. Bakker is Plaintiff's husband. He has knowledge of the tools, techniques
28 and technologies Plaintiff uses, the assistance that he had to provide to help Plaintiff

1 fill out the inaccessible FBN PDF forms, and the emotional and stigmatic injury
2 suffered by Plaintiff. He shares an address with Ms. Martinez and may be contacted
3 through counsel for Plaintiff.

4
5 **B. Documents**

6 Subject to the above reservations, pursuant to Federal Rule of Civil Procedure 26(e), Plaintiff
7 makes the following supplemental disclosures to her initial disclosures under Federal Rule of
8 Civil Procedure 26(a)(1)(A)(i) of additional documents presently in her possession that may be
9 used to support her claims:

- 10 • Documents produced by Plaintiff or Defendants
11 • Deposition exhibits
12 • Exhibits to filings

13 Additionally, accompanying this supplemental disclosure are copies of additional documents
14 currently in Plaintiff's possession that Plaintiff may use to support her claims.

15
16 To the best of my knowledge, information, and belief, formed after an inquiry that is
17 reasonable under the circumstances, this disclosure is complete and correct as of the time it is
18 made.

19
20
21 DATED: September 29, 2023

Respectfully submitted,

22 TRE LEGAL PRACTICE

23 /s/ Timothy Elder

24 Timothy Elder

25 *Attorneys for Plaintiff*
26
27
28

CERTIFICATE OF SERVICE

I, Michelle Korosy, declare as follows:

1. I am a citizen of the United States, over 18 years of age, and not a party to the above-captioned action. My business address is TRE Legal Practice, 4226 Castanos Street, Fremont, CA 94536.
2. On September 29, 2023, I served the following document:
 - a. PLAINTIFF'S SECOND SUPPLEMENTAL DISCLOSURES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 26
3. I accomplished this by causing the document listed above to be delivered via email to the attorneys for Defendants County of Alameda, Melissa Wilk, Eva He, and Maria Laura Briones at the email addresses set forth below.
 - a. Kevin Gilbert: kgilbert@ohshlaw.com
 - b. Nicholas D. Fine: nfine@ohshlaw.com

I declare under penalty of the laws of the United States of America and the State of California that the foregoing is true and correct, and that this declaration was executed in Clovis, California on September 29, 2023.

By: Michelle Korosy

Michelle Korosy